

**EXHIBIT A**

# J.K. "Jess" Irby, Esq.

Clerk of Circuit Court



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## Docket List

**01 2024 CA 003954** - CIRCUIT CIVIL - DIV. K (JUDGE WALKER)  
MOODY, HANNAH -VS- LOVELACE, WILLIAM et al

19 records found

File Date	Docket Text	Amount	Amount Due	Images	# of Pages
01/21/2025	DEFENDANT'S AMENDED SUGGESTION OF BANKRUPTCY AMENDED TO ENCLOSE EXHIBIT A ONLY DEFENDANTS' NOTICE OF APPEARANCE OF LEAD COUNSEL AND DESIGNATION OF EMAIL ADDRESSES				88
01/21/2025	STEVEN D. LEHNER ESQUIRE (Attorney) on behalf of WILLIAM LOVELACE, & BUDDY'S NEWCO LLC				2

(DEFENDANT'S)

ALERT ISSUED

SUGGESTION OF BANKRUPTCY FILED issued on:

01/22/2025

01/17/2025

For: BUDDY'S NEWCO LLC

Bond Amt:

Bond Type:

01/17/2025

SUGGESTION OF BANKRUPTCY FILED (CLOSES)

BUDDY'S NEWCO, LLC (DEFENDANT);



2

01/09/2025

RETURN OF SERVICE ON SUMMONS - SUBSTITUTE

SERVED ON JANUARY 6, 2025



2

RETURN OF SERVICE ON SUMMONS - SERVED ON

01/08/2025

1/2/2024 TO



2

BUDDY'S NEWCO LLC (DEFENDANT);

12/23/2024

ORDER ON PLAINTIFF'S MOTION TO APPOINT PROCESS

SERVER



2

12/16/2024

PLAINTIFF'S REQUESTS TO PRODUCE TO DEFENDANT

EMPLOYER



3

12/16/2024

PLAINTIFF'S REQUESTS TO PRODUCE TO DEFENDANT

DRIVER



3

12/16/2024

PLAINTIFF'S REQUESTS FOR ADMISSIONS TO

DEFENDANT DRIVER



5

12/16/2024

PLAINTIFF'S REQUESTS FOR ADMISSIONS TO

DEFENDANT EMPLOYER



5

12/16/2024

PLAINTIFF'S INTERROGATORIES TO DEFENDANT

EMPLOYER



8

12/16/2024

PLAINTIFF'S INTERROGATORIES TO DEFENDANT DRIVER



9

12/16/2024

MOTION TO APPOINT PROCESS SERVER



2

ISSUED SUMMONS AS TO BUDDY'S NEWCO LLC

12/16/2024

(DEFENDANT);

\$10.00

\$0.00



2

Receipt: 533642 Date: 12/19/2024

ISSUED SUMMONS AS TO WILLIAM LOVELACE

12/16/2024

(DEFENDANT);

\$10.00

\$0.00



2

Receipt: 533642 Date: 12/19/2024

12/16/2024

STANDING CASE MANAGEMENT ORDER PER A.O. 3.09



2

12/16/2024

CIVIL COVER SHEET - JURY TRIAL REQUESTED



3

12/16/2024

COMPLAINT FOR AUTO NEGLIGENCE Receipt: 533642 Date:

12/19/2024

\$400.00

\$0.00



4

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# J.K. "Jess" Irby, Esq.

Clerk of Circuit Court



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## Docket List

**01 2024 CA 003840** - CIRCUIT CIVIL - DIV J (JUDGE KEIM)  
MUNOZ, JONATHAN ORTIZ -VS- LOVELACE, WILLIAM et al

26 records found

File Date    Docket Text

	RETURN OF SERVICE ON SUMMONS - CORPORATE		
01/23/2025	SERVED ON 1/20/2025 AS TO BUDDYS NEWCO LLC (DEFENDANT);		
01/22/2025	SUGGESTION OF BANKRUPTCY FILED AS TO BUDDYS NEWCO LLC (DEFENDANT);		




















Amount	Amount Due	Images	# of Pages
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3



88

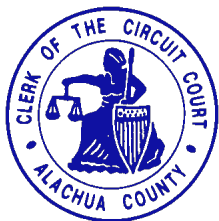
01/22/2025	DEFENDANTS' NOTICE OF APPEARANCE OF LEAD COUNSEL AND DESIGNATION OF EMAIL ADDRESSES ALERT ISSUED SUGGESTION OF BANKRUPTCY FILED issued on: 01/22/2025 For: BUDDYS NEWCO LLC		2
01/22/2025			
	Bond Amt: Bond Type: RETURN OF SERVICE ON SUMMONS - SERVED ON		
01/08/2025	1/2/2025 TO WILLIAM LOVELACE (DEFENDANT);		2
12/18/2024	ORDER ON PLAINTIFF'S MOTION TO APPOINT PROCESS SERVER		2
12/09/2024	PLAINTIFF'S REQUESTS TO PRODUCE TO DEFENDANT EMPLOYER		3
12/09/2024	PLAINTIFF'S REQUESTS FOR ADMISSIONS TO DEFENDANT DRIVER		5
12/09/2024	PLAINTIFF'S REQUESTS FOR ADMISSIONS TO DEFENDANT EMPLOYER		5
12/09/2024	PLAINTIFF'S REQUESTS TO PRODUCE TO DEFENDANT DRIVER		3
12/09/2024	PLAINTIFF'S INTERROGATORIES TO DEFENDANT DRIVER		9
12/09/2024	PLAINTIFF'S INTERROGATORIES TO DEFENDANT EMPLOYER		8
12/09/2024	PLAINTIFF'S AMENDED MOTION TO APPOINT PROCESS SERVER		2
12/09/2024	AMENDED COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL		4
12/04/2024	PLAINTIFF'S REQUEST TO PRODUCE TO DEFENDANT EMPLOYER		3
12/04/2024	PLAINTIFF'S REQUESTS TO PRODUCE TO DEFENDANT DRIVER		3
12/04/2024	PLAINTIFF'S INTERROGATORIES TO DEFENDANT DRIVER		9
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12/04/2024	PLAINTIFF'S REQUEST FOR ADMISSION TO DEFENDANT DRIVER		5
12/04/2024	PLAINTIFF'S REQUESTS FOR ADMISSION TO DEFENDANT EMPLOYER		5
12/04/2024	MOTION TO APPOINT PROCESS SERVER		2
12/04/2024	SUMMONS ISSUED - WITH FEE AS TO BUDDY'S NEWC, LLC (DEFENDANT); Receipt: 532999 Date: 12/09/2024		2
	SUMMONS ISSUED - WITH FEE AS TO WILLIAM		

\$10.00 \$0.00

12/04/2024	LOVELACE (DEFENDANT); Receipt: 532999 Date: 12/09/2024	\$10.00	\$0.00		2
12/04/2024	STANDING CASE MANAGEMENT ORDER PER A.O. 3.09				2
12/04/2024	CIVIL COVER SHEET - JURY TRIAL REQUESTED				3
12/04/2024	COMPLAINT FOR AUTO NEGLIGENCE Receipt: 532999 Date: 12/09/2024	\$400.00	\$0.00		4

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**EXHIBIT B**

Fill in this information to identify the case (Select only one Debtor per claim form):

Debtor: Buddy's Newco, LLC

Case Number: 24-12516

## Modified Official Form 410

# Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense (other than a claim entitled to priority under 11 U.S.C. § 503(b)(9)). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

### Part 1: Identify the Claim

1. Who is the current creditor?	<u>Hannah Shalom Moody c/o Allen Law Firm</u> Name of the current creditor (the person or entity to be paid for this claim)  Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>  Address1: <u>2550 SW 76th St #150 c/o Allen Law Firm</u> Address2: _____ Address3: _____ Address4: _____ City: <u>Gainesville</u> State: <u>FL</u> Postal Code: <u>32608</u> Country: _____  Contact phone: <u>352-331-6789</u> Contact email: <u>abe.banks@allenlaw.com</u>	<b>Where should payments to the creditor be sent? (if different)</b>  Address1: _____ Address2: _____ Address3: _____ Address4: _____ City: _____ State: _____ Postal Code: _____ Country: _____  Contact phone: _____ Contact email: _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ <div>Filed on _____ MM / DD / YYYY</div>	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	



**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?

☒

No

☐

Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_

7. How much is the claim?

\$ \$50,000.00

Does this amount include interest or other charges?

☒

No

☐

Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

Limit disclosing information that is entitled to privacy, such as health care information.

Personal injury

9. Is all or part of the claim secured?

☒

No

☐

Yes. The claim is secured by a lien on property.

**Nature of property:**
☐
Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐

Motor vehicle

☐

Other. Describe: \_\_\_\_\_

**Basis for perfection:** \_\_\_\_\_

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

**Value of property:**

\$ \_\_\_\_\_

**Amount of the claim that is secured:**

\$ \_\_\_\_\_

**Amount of the claim that is unsecured:** \$ \_\_\_\_\_

(The sum of the secured and unsecured amounts should match the amount in line 7.)

**Amount necessary to cure any default as of the date of the petition:**

\$ \_\_\_\_\_

**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %
☐

Fixed

☐

Variable

10. Is this claim based on a lease?

☒

No

☐

Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?

☒

No

☐

Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

Amount entitled to priority

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

☒ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐

I am the creditor.

☒

I am the creditor's attorney or authorized agent.

☐

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

*/s/Abraham Banks* 01/24/2025

Electronic Signature

Date

Name of the person who is completing and signing this claim

*/s/Abraham Banks*

Name

First name

Middle name

Last name

Title/Company

Identify the corporate servicer as the company if the authorized agent is a servicer.

2550 SW 76th St #150

Address

Number Street

Gainesville

FL

32608

City

State

ZIP Code

Country

Contact phone

352-331-6789

Email

abe.banks@allenlaw.com

**Additional Noticing Addresses (if provided):**

**Additional Address 1**

Name:

Address1:

Address2:

Address3:

Address4:

City:

State:

Postal Code:

Country:

Contact Phone:

Contact Email:

**Additional Address 2**

Name:

Address1:

Address2:

Address3:

Address4:

City:

State:

Postal Code:

Country:

Contact Phone:

Contact Email:

**Additional Supporting Documentation Provided**

☒ Yes

☐ No

Attachment Filename:

2024.12.16 complaint.pdf.pdf

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
IN AND FOR ALACHUA COUNTY, STATE OF FLORIDA  
CIVIL DIVISION**

**CASE NO.:**

**HANNAH MOODY,**

**Plaintiff,**

**v.**

**WILLIAM LOVELACE and  
BUDDY'S NEWCO, LLC,**

**Defendants.**

\_\_\_\_\_ /

**COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL**

Plaintiff, HANNAH MOODY, through her undersigned counsel, hereby sues defendants, WILLIAM LOVELACE and BUDDYS HOME FURNISHINGS, and alleges as follows:

1. This is an action for damages more than \$50,000 exclusive of interest, costs, and attorneys' fees.
2. Plaintiff, HANNAH MOODY (hereinafter referred to as "Ms. Moody"), is a resident of Alachua County, Florida.
3. Defendant WILLIAM LOVELACE (hereinafter referred to as "defendant driver") is a resident of Gilchrist County, Florida.
4. Defendant BUDDYS NEWCO, LLC (hereinafter referred to as "defendant employer") is a Foreign Limited Liability Company.
5. Venue is proper in this court because the motor vehicle collision at issue in this lawsuit occurred in Alachua County, Florida.
6. On or about April 13, 2024, defendant driver operated a 2020 Chevrolet motor vehicle.

7. On or about April 13, 2024, defendant employer owned the 2020 Chevrolet motor vehicle operated by defendant driver.
8. On or about April 13, 2024, defendant employer knowingly allowed defendant driver to operate the 2020 Chevrolet motor vehicle.
9. On or about April 13, 2024, at approximately 10:59 a.m. near Windmeadows Boulevard in Alachua County, Florida, defendant driver so negligently and carelessly operated and/or maintained the 2020 Chevrolet motor vehicle that he caused a collision with a motor vehicle operated by Ms. Moody.

**COUNT I**  
**MOTOR VEHICLE NEGLIGENCE CLAIM AGAINST DEFENDANT DRIVER**

10. Ms. Moody restates paragraphs one through nine of this complaint.
11. At all times material hereto, defendant driver owed the following duties to Ms. Moody:
  - a. To maintain a proper lookout for traffic;
  - b. To keep his vehicle under control;
  - c. To operate his vehicle in a careful and prudent manner;
  - d. To follow applicable traffic laws and norms; and
  - e. To avoid causing collisions with other motorists.
12. Defendant driver breached the duties he owed Ms. Moody in the following ways:
  - a. Negligently failing to maintain a proper lookout for traffic;
  - b. Negligently failing to keep his vehicle under control;
  - c. Negligently failing to operate his vehicle in a careful and prudent manner;
  - d. Negligently failing to follow applicable traffic laws and norms; and
  - e. Negligently failing to avoid causing collisions with other motorists.
13. As a direct and proximate result of the negligence of defendant driver, Ms. Moody suffered a

significant and permanent loss of an important bodily function, a permanent injury within a reasonable degree of medical probability, significant scarring, bodily injury and resulting pain and suffering, disability, inconvenience, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, aggravation of a previously existing condition, loss of income, and loss of ability to earn money. These losses are permanent or continuing and Ms. Moody will continue to suffer these losses in the future.

WHEREFORE, Ms. Moody demands judgment against defendant driver for an amount more than \$50,000 together with costs of this action and all other relief to which she may be entitled, and all other relief deemed appropriate.

**COUNT II**  
**RESPONDEAT SUPERIOR CLAIM AGAINST DEFENDANT EMPLOYER**

14. Ms. Moody restates paragraphs one through nine above as if fully set forth herein.
15. Because at the time of the subject collision defendant driver operated the 2020 Chevrolet motor vehicle within the course and scope of his agency and/or employment with defendant employer, defendant employer is responsible for the damages and injuries caused by the negligence of defendant driver pursuant to doctrine of respondeat superior.
16. As a direct proximate result of the negligence of defendant driver, for which defendant employer is liable, Ms. Moody suffered a significant and permanent loss of important bodily function, a permanent injury within a reasonable degree of medical probability, significant scarring, bodily injury, and resulting pain and suffering, disability, inconvenience, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, and aggravation of a previously existing condition. These losses are permanent or continuing and Ms. Moody will continue to suffer these losses in the future.

WHEREFORE, Ms. Moody demands judgment against defendant employer for an amount

more than \$50,000 together with costs of this action and all other relief to which she may be entitled, and all other relief deemed appropriate.

**DEMAND FOR JURY TRIAL**

Ms. Moody demands a trial by jury against defendant driver and defendant employer on all issues so triable.

DATED December 16, 2024.

**ALLEN LAW FIRM, P.A.**

**/s/ Anthony Livingston, Esq.**

William T. Allen, Jr., Esq.

Florida Bar No. 950180

Anthony Livingston, Esq.

Florida Bar No.: 0028050

Abraham C. Banks, Esq.

Florida Bar No.: 020668

2550 S.W. 76th Street, Suite 150

Gainesville, Florida 32608

Phone: (352) 331-6789

Fax: (352) 331-6785

Primary email: [service@allenlaw.com](mailto:service@allenlaw.com)

Secondary email: [kelly@allenlaw.com](mailto:kelly@allenlaw.com)

Attorneys for Plaintiff

Electronic Proof of Claim Confirmation: 3755-1-RTNNC-357673039

Claim Electronically Submitted on (UTC) : 2025-01-24T03:01:26.508Z

Submitted by: Hannah Shalom Moody  
abe.banks@allenlaw.com



Fill in this information to identify the case (Select only one Debtor per claim form):

Debtor: Buddy's Newco, LLC

Case Number: 24-12516

## Modified Official Form 410

### Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense (other than a claim entitled to priority under 11 U.S.C. § 503(b)(9)). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

#### Part 1: Identify the Claim

1. Who is the current creditor?	<u>Jonathan Ortiz Munoz c/o Allen Law Firm</u> Name of the current creditor (the person or entity to be paid for this claim)  Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>  Address1: <u>2550 SW 76th Street Ste 150</u> Address2: _____ Address3: _____ Address4: _____ City: <u>Gainesville</u> State: <u>FL</u> Postal Code: <u>32608</u> Country: _____ Contact phone: <u>352-331-6789</u> Contact email: <u>abe.banks@allenlaw.com</u>	<b>Where should payments to the creditor be sent? (if different)</b>  Address1: _____ Address2: _____ Address3: _____ Address4: _____ City: _____ State: _____ Postal Code: _____ Country: _____ Contact phone: _____ Contact email: _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____	Filed on _____ MM / DD / YYYY
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?

☒
☐

No

Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_

7. How much is the claim?

\$ \$750,00.00

Does this amount include interest or other charges?

☒
☐

No

Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

Limit disclosing information that is entitled to privacy, such as health care information.

Personal injury

9. Is all or part of the claim secured?

☒
☐

No

Yes. The claim is secured by a lien on property.

**Nature of property:**☐Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.☐

Motor vehicle

☐

Other. Describe: \_\_\_\_\_

**Basis for perfection:** \_\_\_\_\_

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

**Value of property:**

\$ \_\_\_\_\_

**Amount of the claim that is secured:**

\$ \_\_\_\_\_

**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)**Amount necessary to cure any default as of the date of the petition:**

\$ \_\_\_\_\_

**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %☐

Fixed

☐

Variable

10. Is this claim based on a lease?

☒
☐

No

Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?

☒
☐

No

Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

Amount entitled to priority

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

☒ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐  
☒  
☐  
☐

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

*/s/Abraham Banks* 01/24/2025

Electronic Signature

Date

Name of the person who is completing and signing this claim

*/s/Abraham Banks*

Name

First name

Middle name

Last name

Title/Company

Identify the corporate servicer as the company if the authorized agent is a servicer.

2550 SW 76th St #150

Address

Number Street

Gainesville

FL

32608

City

State

ZIP Code

Country

Contact phone

352-331-6789

Email

abe.banks@allenlaw.com

**Additional Noticing Addresses (if provided):**

**Additional Address 1**

Name:

Address1:

Address2:

Address3:

Address4:

City:

State:

Postal Code:

Country:

Contact Phone:

Contact Email:

**Additional Address 2**

Name:

Address1:

Address2:

Address3:

Address4:

City:

State:

Postal Code:

Country:

Contact Phone:

Contact Email:

**Additional Supporting Documentation Provided**



Yes



No

Attachment Filename:

2024.12.04 Complaint.pdf.pdf

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
IN AND FOR ALACHUA COUNTY, STATE OF FLORIDA  
CIVIL DIVISION**

**CASE NO.:**

**JONATHAN MUÑOZ,**

**Plaintiff,**

**v.**

**WILLIAM LOVELACE and  
BUDDY'S NEWCO, LLC,**

**Defendants.**

\_\_\_\_\_ /

**COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL**

Plaintiff, JONATHAN MUÑOZ, through his undersigned counsel, hereby sues defendants, WILLIAM LOVELACE and BUDDY'S NEWCO, LLC, and alleges as follows:

1. This is an action for damages more than \$50,000 exclusive of interest, costs, and attorneys' fees.
2. Plaintiff, JONATHAN MUÑOZ (hereinafter referred to as "Mr. Muñoz"), is a resident of Alachua County, Florida.
3. Defendant WILLIAM LOVELACE (hereinafter referred to as "defendant driver") is a resident of Gilchrist County, Florida.
4. Defendant BUDDY'S NEWCO, LLC (hereinafter referred to as "defendant employer") is a Foreign Limited Liability Company.
5. Venue is proper in this court because the motor vehicle collision at issue in this lawsuit occurred in Alachua County, Florida.
6. On or about April 13, 2024, defendant driver operated a 2020 Chevrolet motor vehicle.

7. On or about April 13, 2024, defendant employer owned the 2020 Chevrolet motor vehicle operated by defendant driver.
8. On or about April 13, 2024, defendant employer knowingly allowed defendant driver to operate the 2020 Chevrolet motor vehicle.
9. On or about April 13, 2024, at approximately 10:59 am near Windmeadows Boulevard in Alachua County, Florida, defendant driver so negligently and carelessly operated and/or maintained the 2020 Chevrolet motor vehicle that he caused a collision with a motor vehicle operated by Mr. Muñoz.

**COUNT I**  
**MOTOR VEHICLE NEGLIGENCE CLAIM AGAINST DEFENDANT DRIVER**

10. Mr. Muñoz restates paragraphs one through nine of this complaint.
11. At all times material hereto, defendant driver owed the following duties to Mr. Muñoz:
  - a. To maintain a proper lookout for traffic;
  - b. To keep his vehicle under control;
  - c. To operate his vehicle in a careful and prudent manner;
  - d. To follow applicable traffic laws and norms; and
  - e. To avoid causing collisions with other motorists.
12. Defendant driver breached the duties he owed Mr. Muñoz in the following ways:
  - a. Negligently failing to maintain a proper lookout for traffic;
  - b. Negligently failing to keep his vehicle under control;
  - c. Negligently failing to operate his vehicle in a careful and prudent manner;
  - d. Negligently failing to follow applicable traffic laws and norms; and
  - e. Negligently failing to avoid causing collisions with other motorists.
13. As a direct and proximate result of the negligence of defendant driver, Mr. Muñoz suffered a

significant and permanent loss of an important bodily function, a permanent injury within a reasonable degree of medical probability, significant scarring, bodily injury and resulting pain and suffering, disability, inconvenience, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, aggravation of a previously existing condition, loss of income, and loss of ability to earn money. These losses are permanent or continuing and Mr. Muñoz will continue to suffer these losses in the future.

WHEREFORE, Mr. Muñoz demands judgment against defendant driver for an amount more than \$50,000 together with costs of this action and all other relief to which he may be entitled, and all other relief deemed appropriate.

**COUNT II**  
**RESPONDEAT SUPERIOR CLAIM AGAINST DEFENDANT EMPLOYER**

14. Mr. Muñoz restates paragraphs one through nine above as if fully set forth herein.
15. Because at the time of the subject collision defendant driver operated the 2020 Chevrolet motor vehicle within the course and scope of his agency and/or employment with defendant employer, defendant employer is responsible for the damages and injuries caused by the negligence of defendant driver pursuant to doctrine of respondeat superior.
16. As a direct proximate result of the negligence of defendant driver, for which defendant employer is liable, Mr. Muñoz suffered a significant and permanent loss of important bodily function, a permanent injury within a reasonable degree of medical probability, significant scarring, bodily injury, and resulting pain and suffering, disability, inconvenience, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, and aggravation of a previously existing condition. These losses are permanent or continuing and Mr. Muñoz will continue to suffer these losses in the future.

WHEREFORE, Mr. Muñoz demands judgment against defendant employer for an amount

more than \$50,000 together with costs of this action and all other relief to which he may be entitled, and all other relief deemed appropriate.

**DEMAND FOR JURY TRIAL**

Mr. Muñoz demands a trial by jury against defendant driver and defendant employer on all issues so triable.

DATED December 4, 2024.

**ALLEN LAW FIRM, P.A.**

**/s/ Anthony Livingston, Esq.**

William T. Allen, Jr., Esq.

Florida Bar No. 950180

Anthony Livingston, Esq.

Florida Bar No.: 0028050

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Attorneys for Plaintiff



Electronic Proof of Claim Confirmation: 3755-1-OKVQM-124628960

Claim Electronically Submitted on (UTC) : 2025-01-24T02:48:35.465Z

Submitted by: Jonathan Ortiz Munoz  
abe.banks@allenlaw.com